



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Matthew A. Beaton
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Commissioner

March 15, 2016

Important Notice of Required Actions Revised Total Coliform Rule – Start date April 1, 2016

Dear Public Water Supplier,

The Massachusetts Department of Environmental Protection, Drinking Water Program (MassDEP DWP) is in the process of incorporating the Revised Total Coliform Rule (RTCR) into the Massachusetts Drinking Water Regulations 310 CMR 22.00, in accordance with the federal Safe Drinking Water Act. The federal RTCR can be found at <https://www.gpo.gov/fdsys/pkg/FR-2013-02-13/pdf/2012-31205.pdf>. The RTCR takes effect on April 1, 2016, and applies to all public water systems (PWS). **MassDEP will be promulgating final regulations to incorporate the RTCR by April 1, 2016. All Public Water Suppliers must comply with the RTCR starting on April 1, 2016.**

The purpose of the RTCR is to increase public health protection by reducing potential pathways of entry for fecal contamination into distribution systems. The RTCR retains the maximum contaminant level (MCL) for *E. coli* and uses *E. coli* and total coliforms to initiate a “find and fix” approach to protect the distribution system from potential pathways for fecal contamination.

To comply with the RTCR, Public Water Suppliers must take the following actions:

1) Continue to collect all bacteria samples according to your current MassDEP DWP approved coliform sampling plan.

- a) Your current coliform sampling plan is approved by MassDEP DWP and will remain approved until you are informed otherwise by MassDEP DWP.
- b) PWSs on quarterly sampling may be triggered into increased monitoring.

For more information on coliform sampling locations and plans, please contact your MassDEP DWP regional office.

For more information on increased monitoring triggers for PWS sampling quarterly, see the RTCR information webpage listed at the end of this notice for the Fact Sheet titled “*Requirements for Small Systems on Quarterly Monitoring.*”

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-5751. TTY# MassRelay Service 1-800-439-2370
MassDEP Website: www.mass.gov/dep

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2) Perform a Level 1 Assessment, starting with the April monitoring period, if your system meets any of the following conditions:

- a) Your system collects fewer than 40 samples per month and has 2 or more total coliform positive and routine/repeat samples in the same month.
- b) Your system collects at least 40 samples per month and has greater than 5% of the routine/repeat samples in the same month that are total coliform positive.
- c) Your system fails to take every required repeat sample after any single total coliform positive sample.

You must notify MassDEP DWP within 5 calendar days from the collection date of the sample that triggered the assessment.

See the RTCR information webpage listed at the end of this notice for the following:

- Level 1 Assessment Instructions
- Level 1 Assessment Form

3) Perform a Level 2 Assessment if your system meets any of the following conditions:

- a) Your system has one or more of the following *E. coli* MCL violations, starting with the April monitoring period:
 - An *E. coli* positive repeat sample following an associated total coliform positive routine sample.
 - A total coliform positive repeat sample following an *E. coli* positive routine sample.
 - Your system failed to take all required repeat samples following an *E. coli* positive routine sample.
 - Your system failed to analyze for *E. coli* when any repeat sample tests positive for total coliform.
- b) Your system triggers a second Level 1 Assessment within a rolling 12-month period starting April 1, 2016, and MassDEP DWP has not determined that the corrective actions taken by your system after the first Level 1 Assessment resolved the cause of the first total coliform positive samples.

You must notify MassDEP DWP within 5 calendar days from the collection date of the sample that triggered the assessment.

You are required to ensure that all Level 2 Assessments are conducted by a MassDEP-approved party unless, within ten days of the Treatment Technique trigger, you are notified in writing by the MassDEP that the Level 2 assessment will be conducted by MassDEP. MassDEP considers the following individuals qualified to perform Level 2 assessments:

- Certified Drinking Water Supply Facility Operators who maintain a full license of grade level at least equal to or higher than that of the classification of the distribution system and/or treatment system, if applicable, e.g. your primary certified operator for distribution and/or treatment, or
- A technical assistance provider under contract with MassDEP.

MassDEP may approve other individuals to perform Level 2 Assessments. For more information see the document titled "*Criteria for Approval of Individuals Allowed to Conduct RTCR Level 2 Assessments.*"

See the RTCR information webpage listed at the end of this notice for the following:

- Level 2 Assessment Instructions
- Level 2 Assessment Form
- Criteria for Approval of Individuals Allowed to Conduct RTCR Level 2 Assessments

4) If you are a seasonal system (a non-community PWS that is not operated on a year-round basis and starts up and shuts down at the beginning and end of each operating season) you must do the following:

- a) Certify in writing to MassDEP DWP, no less than 7 days prior to serving water to the public each season, that your system has performed and followed the MassDEP DWP approved seasonal system start up procedure.
- b) Collect coliform samples in accordance with your approved coliform sampling plan prior to opening and submit results to MassDEP DWP.

- c) Monitor for total coliforms each calendar month (or quarter) of operation in accordance with your approved total coliform sampling plan.

It is strongly recommended that seasonal systems follow the MassDEP DWP shut down procedures at the end of the season. Please also note that MassDEP DWP has informed all boards of health with shared oversight of seasonal PWSs of the RTCR and the specific seasonal systems in their communities.

See the RTCR information webpage listed at the end of this notice for the following:

- Fact Sheet: Requirements for Seasonal Systems
- Seasonal Start-Up Procedure and Certification
- Seasonal System Shutdown Procedure Guide
- Seasonal System Exemption Form
- Board of Health Notification

5) Issue public notification for all RTCR violations.

- a) PWSs are required to issue public notification (PN) for all specified violations within required timeframes.
- Some changes under RTCR include an expanded *E. coli* violation; elimination of the monthly MCL violation; and addition of new treatment technique violations for assessments, corrective actions and seasonal system start-up certifications.

See the RTCR information webpage listed at the end of this notice for a list of specified violations and PN templates.

6) Issue a Consumer Confidence Report (CCR) for RTCR violations.

- a) Community PWSs will be required to report RTCR violations in their CCR beginning July 2017. Please note: Total Coliform Rule (TCR) violations from January 1, to March 31, 2016 must also be included in the July 2017 CCR.
- b) Community PWSs must use specific language in their CCRs when they conduct a triggered assessment or if they incur an *E. coli* MCL violation. CCR information is reported for each calendar year, therefore any RTCR triggered assessments or violations incurred in 2016 are to be included in the 2017 CCR.
- b) Non-transient non-community (NTNC) and transient non-community (TNC) PWSs must post any CCR notices provided by MassDEP DWP.

See the RTCR information webpage listed at the end of this notice for CCR information.

Training

To help you comply with the RTCR, MassDEP DWP and its partners are providing training. These training sessions will provide an overview of the RTCR and the specific steps PWSs should take to comply with the RTCR.

REGION	DATE	TRAINING LOCATION
SERO	April 5, 2016	SERO Office 20 Riverside Dr. Lakeville 02347
WERO	April 8, 2016	WERO Office 436 Dwight St. Springfield 01103
CERO	April 12, 2016	CERO Office 8 New Bond St. Worcester 01606
NERO	April 14, 2016	Wilmington Town Hall, 121 Glen Rd. Wilmington 01887

Each session will take place from 9:00 AM to 12:00 PM (8:30 AM registration), will offer three (3) Training Contact Hours (TCH), and will be limited to the first 50 registrants. We ask that a limit of two persons per organization attend; a waiting list for additional staff will be maintained. To register for the training, please RSVP to

Program.Director-DWP@state.ma.us and include "RTCR Training" in the subject line. Please include your name, PWS or company, telephone number, and email address (if applicable) as well as the regional location where you will attend the training. You will receive confirmation via an email. A video of the presentation will be available for online viewing from MassDEP's website after the sessions. For agenda, directions and other training information see <http://www.mass.gov/eea/agencies/massdep/water/drinking/water-systems-ops.html#38>.

You may also check for future trainings at MassDEP DWP Training Website Page:

<http://www.mass.gov/eea/agencies/massdep/water/drinking/drinking-water-training-class-schedules.html>.

Technical Assistance

If you have any questions regarding the RTCR please use the following contact information:

LOCATION	NAME	PHONE#	EMAIL ADDRESS
WERO	Susan Steenstrup	413-755-2264	susan.steenstrup@state.ma.us
CERO	Paula Caron	508-767-2719	paula.caron@state.ma.us
NERO	James Persky	978-694-3227	james.persky@state.ma.us
SERO	Karen Dube	508-946-2720	karen.dube@state.ma.us

If you wish to be contacted by a technical assistance provider please contact Michael Maynard at 508-767-2735 or michael.maynard@state.ma.us.

You may also contact the Drinking Water Program by email at Program.director-dwp@state.ma.us.

More Information

For more information on the new requirements, please see the RTCR information on MassDEP's website at: <http://www.mass.gov/eea/agencies/massdep/water/drinking/water-systems-ops.html#39> and also EPA's information at: http://water.epa.gov/lawsregs/rulesregs/sdwa/tcr/regulation_revisions.cfm.

If you are unable to download any of the documents, please contact your regional Technical Assistance provider listed above for assistance.

MassDEP DWP looks forward to continuing to work with you to protect the public health and to comply with RTCR. Thank you for your continued work to provide safe drinking water.

Sincerely,



Yvette DePeiza
Program Director
Drinking Water Program
MassDEP BWR

CC: USEPA Kevin Reilly, Denise Springborg, BOH, MA.DPH Jan Sullivan

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